

MUNICIPAL MERCURY POLLUTANT MINIMIZATION PROGRAM
(MERCURY PMP)

(1) **PREPARING A MERCURY PMP PLAN**

Compile/Maintain Mercury Source Reduction Library

- Mercury as a pollutant including environmental and health effects
- Mercury product use and alternative non-mercury products
- Mercury educational outreach materials and measures of outreach performance
- Mercury reduction examples, case studies, and websites

Prepare Baseline Information

- Compile existing mercury data on POTW influent, effluent, and biosolids
- Compile historical mercury reduction activities for SECTORS listed below
- Identify specific Facilities in community for each SECTOR listed below

Establish Partnerships

- Educational Outreach – health department, UW Extension, environmental NGOs, media contacts
- Mercury-using Sectors – representatives from SECTORS listed below
- Mercury Recyclers – solid waste department, clean sweep coordinators, private vendors
- WDNR – wastewater engineer, hazardous waste specialist, mercury reduction coordinator

Discuss Goals

- Reduce Use of mercury-containing products by promoting alternatives
- Promote Recycling of mercury-containing products that continue to be used
- Reduce potential for mercury Spills

Identify and Promote Mercury Recycling Infrastructure

- Convenient and low cost (or free) mercury recycling available to small quantity generators and general public in SECTORS listed below
- Promote, and expand if necessary, outlets for disposal and recycling of mercury products
- Assist mercury collections as appropriate

Prepare Mercury PMP Plan for SECTORS listed below

- Select educational ACTIVITIES promoting mercury reduction and recycling
- Identify PERFORMANCE MEASURES for selected Activities and Facilities
- Establish Schedule for ACTIVITIES, PERFORMANCE MEASURES, and reaching GOALS
- COMPLETE THE CIRCLE by evaluating achievement of GOALS for each Sector

Note: Public grant funds or private contributions will support educational outreach activities beyond those ACTIVITIES listed in paragraphs (2) and (3), and have been shown to increase SECTOR participation, e.g., thermometer exchanges, school mercury bounties, dairy manometer replacement programs, etc. Solicitation and utilization of grant funds and private contributions is encouraged.

Note: Several municipalities may collaboratively prepare and implement a Mercury PMP Plan in order to more efficiently conduct educational outreach and mercury product recycling. Implementation of collective mercury reduction activities with proportionate municipal participation is encouraged.

(2) SECTOR MERCURY REDUCTION ACTIVITIES (BASIC)

SECTORS listed in Paragraph (2) must be addressed as part of the Municipal Mercury Pollutant Minimization Program. Specific ACTIVITIES and PERFORMANCE MEASURES may vary by municipality in order to most efficiently implement effective mercury reduction educational outreach.

SECTOR	ACTIVITY	PERFORMANCE MEASURE	GOAL
Medical- Hospitals, Clinics, Nurs Homes, Veterinarians	Mail AHA BMP literature Workshop, staff Onsite Visit(s)	date/content participation mercury reduction progress quantity of mercury recycled	mercury-free spill management
Dental- Clinics, Individuals	Mail WDA BMP literature Component Meetings, dentists Onsite Visit Survey(s)	date/content participation mercury recycling progress quantity of mercury recycled	mercury-all capture/recycle
Schools- Secondary	Mail WDNR BMP literature Workshop, teachers Onsite Visit(s)	date/content participation mercury reduction progress quantity of mercury recycled	mercury-free spill management
Schools- College/Tech, Laboratories	see Medical/School Sectors	see Medical/School Sectors	
General Industry, POTW	Mail chemical/equipment literature Onsite Visit as part of inspection or as requested	date/content mercury reduction progress quantity of mercury recycled	mercury-low content materials spill management
General Public	Promote mercury clean sweeps, Mercury displays at sport/home shows and community events, Build local mercury website	date/content date/content quantity of mercury recycled website "hits"	mercury-reduced mercury-recycle spill management

(3) SECTOR MERCURY REDUCTION ACTIVITIES (OTHER)

SECTORS listed in Paragraph (3) may be addressed as part of the Municipal Mercury Pollutant Minimization Program and, if implemented and documented, will be credited in the Department's evaluation of the Mercury PMP. Specific ACTIVITIES and PERFORMANCE MEASURES may vary by municipality in order to most efficiently implement effective mercury reduction educational outreach.

SECTOR	ACTIVITY	PERFORMANCE MEASURE	GOAL
Thermostats- HVAC Wholesalers/ Contractors, Retail Stores	Mail WDNR TRC literature Workshop, trade association Onsite Visit Survey(s)	date/content participation mercury recycling progress quantity of mercury recycled	mercury-all capture/recycle spill management
Automotive Switches (also, Appliance Switches)	Onsite Visit(s) – service centers replace hood/trunk switches Onsite Visit(s) – scrap yards clip and recycle switches	date/content participation quantity of mercury recycled quantity of mercury recycled	mercury-all capture/recycle spill management
Dairy Manometers	Mail WDNR free-Brochure	date/content participation quantity of mercury recycled	mercury-all capture/recycle spill management
Outside POTW Boundaries	see all SECTORS above	see all SECTORS above	see all SECTORS

(4) COMPLETING THE CIRCLE

Quantify Program Results

SECTOR participation, including current and historical ACTIVITIES
and accomplishment of GOALS (description/data)
SECTOR participation, outside municipal boundaries (description/data)
Mercury recycled or discontinued (quantity)
POTW mercury influent, effluent, and biosolids (analytical data)

Evaluate and Promote/Adjust Program

Successful Facilities/Sectors – recognize and promote
Less Successful Facilities/Sectors – propose Mercury PMP program adjustments

Report Mercury Reduction Activities/Results

To WDNR - annually
To Other Wisconsin Communities - periodically

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MUNICIPAL MERCURY REGULATORY PROGRAM

The alternative to the Municipal Mercury Pollutant Minimization Program described above is a Municipal Mercury Regulatory Program. If a municipality does not prepare or effectively implement a Mercury Pollutant Minimization Program, or if users of the publicly owned treatment works do not effectively implement mercury source reduction practices, the municipality may need to implement a Municipal Mercury Regulatory Program. Pursuant to NR 211.10 (3) Wis. Adm. Code, this will require municipal development and enforcement of mercury discharge standards for users of the sanitary sewer system. Municipal implementation of such standards will include a program of permits, wastewater monitoring, and stepped enforcement to ensure user compliance with these standards.

Pursuant to NR 211.10(1) users of publicly owned treatment works may not discharge mercury into the sanitary sewer system which contributes to the treatment works exceeding water quality based effluent limits. Product substitution, process changes, spill prevention, and/or installation of treatment technology may be required of users to achieve compliance with municipal mercury discharge standards. Periodic reporting of mercury reduction activities to the municipality will also be required.